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*Counsel for Defendants*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

AMERICAN CONTRACTORS  
INDEMNITY COMPANY,  
  
Plaintiff,

v.

ALPHA ENERGY AND ELECTRIC, INC.,  
et al.,  
  
Defendants.

Case No. 2:23-cv-00615-JCM-EJY

**STIPULATION TO EXTEND TIME  
FOR DEFENDANTS TO RESPOND  
TO ACIC'S MOTION FOR SUMMARY  
JUDGMENT (FIRST REQUEST)**

Plaintiff filed a motion for summary judgment on September 26, 2023 (Doc. #17).  
Defendants' response to that motion is due to be filed no later than October 17, 2023.  
Defense counsel has been out of the office for much of the past two weeks and requires  
additional time to review and analyze the motion and prepare an appropriate response  
in consultation with his clients. Pursuant to Fed. R. Civ. P. 6(b)(1) and LR IA 6-1, this

1 constitutes good cause for an extension of the response deadline. No prior extensions  
2 to respond to this motion for summary judgment have been requested. In accordance  
3 with LR IA 6-1, the parties hereby stipulate to an extension of time until **November 7,**  
4 **2023** for Defendants to file their response to Plaintiff's motion for summary judgment  
5 (Doc. #17).  
6

7 Respectfully submitted this 13th day of October 2023 by:  
8

9 **KRIGEL & KRIGEL, P.C.**

10 By: /s/ Stephen J. Moore

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21 **THE FAUX LAW GROUP**

22 By: /s/ Jordan F. Faux

23 Kurt C. Faux NV #003407  
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25 Jordan F. Faux NV #012205  
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Henderson, Nevada 89014

27 *Counsel for Plaintiff*  
28

**CERTIFICATE OF SERVICE**

The undersigned counsel certifies that a true and correct copy of the foregoing document was served this 13th day of October 2023 via the ECF filing system upon the following:

**Counsel for Plaintiff ACIC**

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Willi H. Siepmann  
Jordan F. Faux  
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Henderson, NV 89014

/s/ Stephen J. Moore  
Attorney for Defendants

**IT IS SO ORDERED:**

  
**HON. JAMES C. MAHAN**  
**UNITED STATES DISTRICT JUDGE**

**DATED:** October 16, 2023